

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

WILLIAM C. HAYWOOD,

Plaintiff,

v.

**MICHAEL P. OTERO and RUBEN
ESCAJEDA,**

Defendants.

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CAUSE NO. EP-20-CV-114-KC

VERDICT FORM

We the jury unanimously find, as proven by Plaintiff William C. Haywood by a preponderance of the evidence:

Claims Against Defendant Michael P. Otero

1. Did Defendant Michael P. Otero violate Plaintiff Haywood's constitutional right to be free from the use of excessive force during transport from University Medical Center on April 27, 2018?

_____ Yes ☒ No

If you answered yes to question 1, proceed to question 2. If you answered no to question 1, proceed to question 5.

2. Is Defendant Otero entitled to qualified immunity from the April 27, 2018, claim?

_____ Yes _____ No

If you answered yes to question 2, proceed to question 5. If you answered no to question 2, proceed to question 3.

3. How much money, if any, do you award as compensatory damages for the injuries proximately caused to Plaintiff Haywood by Defendant Otero's alleged wrongful conduct during transport from University Medical Center on April 27, 2018?

\$ _____

After you answer question 3, proceed to question 4.

4. How much money, if any, do you award as punitive damages against Defendant Otero for his alleged wrongful conduct during transport from University Medical Center on April 27, 2018?

\$ _____

After you answer question 4, proceed to question 5.

5. Did Defendant Michael P. Otero violate Plaintiff Haywood's constitutional right to be free from the use of excessive force on April 27, 2019?

_____ Yes ☒ No

If you answered yes to question 5, proceed to question 6. If you answered no to question 5, proceed to question 9.

6. Is Defendant Otero entitled to qualified immunity from the April 27, 2019, claim?

_____ Yes _____ No

If you answered yes to question 6, proceed to question 9. If you answered no to question 6, proceed to question 7.

7. How much money, if any, do you award as compensatory damages for the injuries proximately caused to Plaintiff Haywood by Defendant Otero's alleged wrongful conduct on April 27, 2019?

\$ _____

After you answer question 7, proceed to question 8.

8. How much money, if any, do you award as punitive damages against Defendant Otero for his alleged wrongful conduct on April 27, 2019?

\$ _____

After you answer question 8, proceed to question 9.

Claims Against Defendant Ruben Escajeda

9. Did Defendant Ruben Escajeda violate Plaintiff Haywood's constitutional right to be free from the use of excessive force at University Medical Center on April 27, 2018?

_____ Yes ☒ No

If you answered yes to question 9, proceed to question 10. If you answered no to question 9, stop answering questions.

10. Is Defendant Escajeda entitled to qualified immunity?

_____ Yes _____ No

If you answered yes to question 10, stop answering questions. If you answered no to question 10, proceed to question 11.

11. How much money, if any, do you award as compensatory damages for the injuries proximately caused to Plaintiff Haywood by Defendant Escajeda's alleged wrongful conduct at University Medical Center on April 27, 2018?


\$ _____

After you answer question 11, proceed to question 12.

12. How much money, if any, do you award as punitive damages against Defendant Escajeda for his alleged wrongful conduct at University Medical Center on April 27, 2018?

\$ _____

Dated this 5th day of November, 2025, at El Paso, Texas.



Foreperson